

BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF MILTON MCELROY, JR
BEFORE THE TENNESSEE REGULATORY AUTHORITY
DOCKET NO. 97-00309
July 22, 2002

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
TELECOMMUNICATIONS, INC., YOUR BUSINESS ADDRESS, AND YOUR
EXPERIENCE AND BACKGROUND.

A. My name is Milton McElroy, Jr. I am employed by BellSouth
Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services.
In this position, I am responsible for Operations Support Systems ("OSS")
Testing across the BellSouth region. My business address is 675 West
Peachtree Street, Atlanta, Georgia 30375. I have over 14 years of experience in
Engineering and Operations. I earned a Bachelor of Science degree from
Clemson University in Civil Engineering in 1988 and a Master's degree in
Business Administration from Emory University in 2001. Additionally, I am a
registered Professional Engineer in North Carolina, South Carolina and Alabama.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut the testimony of Mr. Jay Bradbury with
AT&T, Ms. Sherry Lichtenberg with WorldCom, Ms. Colette Davis with Covad,

1 and Ms. Mary Conquest with DeltaCom by providing this Authority with evidence
2 about the regionality of BellSouth's systems as tested by
3 PricewaterhouseCoopers ("PwC"), together with information concerning the
4 Georgia and Florida Third Party OSS testing conducted by KPMG Consulting
5 (KCI).

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7 Many of the CLECs' claims about the OSS Tests in Georgia and Florida, as well
8 as their claims about the regionality of BellSouth's Pre-ordering and Ordering
9 Systems are the same issues that have been raised by the CLECs in response to
10 BellSouth's federal 271 filings. BellSouth has addressed these matters
11 extensively its filings with the FCC, and for the sake of brevity and conciseness, I
12 am adopting as part of my testimony the following paragraphs from the Affidavit
13 of William N. Stacy filed on June 20, 2002 with the Federal Communications
14 Commission: paragraphs 29 to 38 on the Georgia OSS Test, paragraphs 62 to
15 78 on the PwC Regionality Assessment, and paragraphs 324 to 329 on the
16 Florida OSS Test. I am also adopting the following exhibits that are attached to
17 the Affidavit of William N. Stacy: Exhibit WNS-4, Exhibit WNS-5, Exhibit WNS-6,
18 Exhibit WNS-7, Exhibit WNS-10, Exhibit WNS-11, Exhibit WNS-12, Exhibit WNS-
19 50, Exhibit WNS-52, Exhibit WNS-53. Both Mr. Stacy's affidavit and exhibits can
20 be found in Mr. Ron Pate's Exhibit RMP-1.

21
22 I have personal knowledge of the matters contained in the paragraphs and
23 exhibits of Mr. Stacey's Affidavit that I have adopted and I am fully capable and
24 qualified to attest to the accuracy of the information contained therein and to
25 respond to questions regarding those paragraphs.

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Finally, I use many acronyms throughout my testimony. To aid the reader in understanding these terms, I have attached as Exhibit MM-1, a list of these acronyms and their meanings to facilitate understanding my testimony.

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6 Q.

PLEASE DISCUSS THE SUGGESTIONS MADE ON PAGES 4 AND 5 OF MS. CONQUEST'S TESTIMONY, AND ON PAGES 13 TO 18 OF MS. DAVIS'S TESTIMONY REGARDING THIS AUTHORITY'S USE OF OSS TESTING THAT HAS BEEN DONE IN GEORGIA AND FLORIDA.

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11 A.

Both parties suggest that this Authority should not consider the OSS Testing in Georgia or Florida. They suggest that this Authority should undertake the same testing in Tennessee simply because the Florida and Georgia tests were not conducted in Tennessee. As an example, Ms. Davis says on page 18 of her testimony, "[b]efore BellSouth can use testing to support its assertion that it has met the requirements of Checklist Item 2 with regard to OSS, such testing would have to be done in Tennessee, not in some other state."

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This position makes no sense, and it is intended solely to delay this proceeding and, as a result, the opportunity for Tennesseans to enjoy more competitive telecommunications choices. Indeed, this position is inconsistent with the testimony of other CLEC witnesses in this proceeding, who are more than willing to use the results of the Florida and Georgia tests when they can claim that those tests support their point of view. BellSouth respectfully submits that the Authority

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1 should conclude that additional expensive and lengthy testing specifically for
2 Tennessee is not required. Such a conclusion would rest on the following facts.

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4 First, the Georgia OSS Test meets all of the criteria established by the FCC in its
5 decision on Bell Atlantic's New York application regarding the characteristics of
6 an appropriate OSS test. Specifically, in the Georgia OSS Test, as in the New
7 York OSS Test, KCI acted as an independent tester, conducted a military-style
8 test, made efforts to place itself in the position of an actual market entrant, and
9 made efforts to maintain blindness so that BellSouth would not know that any
10 particular order came from KCI whenever possible. In compliance with Federal
11 Communications Commission (FCC) decisions, the Georgia Test was a focused
12 test that appropriately concentrated on the specific areas of BellSouth's OSS that
13 had not experienced significant commercial usage. KCI tested what was
14 ordered to be tested by the Georgia Commission after extensive CLEC input and
15 participation. Some products and system functionality were not available when
16 the Georgia Master Test Plan (see Exhibit MM-2) was developed or when testing
17 occurred. However, on January 12, 2000, the Georgia Commission issued an
18 order requiring BellSouth to initiate additional testing of its OSS. The
19 Supplemental Test Plan (STP), provided as Exhibit MM-3, includes: an
20 assessment of the change management process as it applied to the
21 implementation of Release 6.0 (also known as OSS99); an evaluation of the
22 current pre-ordering, ordering, and provisioning of xDSL compatible loops; a
23 functional test of resale pre-ordering, ordering, provisioning, maintenance and
24 repair, and billing transactions for the top 50 electronically orderable retail
25 services available for resale that have not experienced significant commercial

1 usage; and an evaluation of the processes and procedures for the collection and
2 calculation of performance data. Together, the MTP and STP provide a
3 complete description of the processes, systems and procedures used by
4 BellSouth. These processes, systems and procedures used to provide
5 wholesale elements and services to CLECs in Georgia are the same processes,
6 systems and procedures used to provide those same elements to CLECs in
7 Tennessee and in the other seven states in BellSouth's nine-state region.
8 Details of KPMG's evaluation and methods of analysis, and the results of the
9 MTP, STP, and the Flow-Through Evaluation Plan are contained in the Master
10 Test Plan Final Report (MTP Final Report), the Supplemental Test Plan Final
11 Report (STP Final Report), and the Flow Through Evaluations, which were filed
12 at the Georgia Commission on March 20, 2001. The MTP Final Report, the STP
13 Final Report, and the Flow-Through Evaluation are attached as Exhibits MM-4
14 through MM-6.

15

16 Ms Davis essentially complains that the Georgia Test did not test everything.
17 Third Party OSS Tests, by their nature, must test a snapshot in time. The fact
18 that things change during or after the test does not alleviate the probative value
19 of the test, which proves that BellSouth provides adequate access, functionality,
20 and performance to CLECs. The fact that the systems have evolved since the
21 Georgia Test should not impact this Authority's use of the test. Otherwise, no
22 third-party test would ever have value.

23

24 Second, the Florida OSS Test meets these same criteria as established in the
25 New York and Georgia Tests. The Florida Test did address additional test points

1 including products that were not available at the time of the Georgia Test and
2 some additional processes that support the CLEC Community such as Account
3 Teams and Training. The results of the Florida Test, which were published on
4 June 21, 2002 and are being provided as Exhibit MM-7, were similar to the
5 results in the Georgia Test. The results of the Georgia Test were that 98% of the
6 evaluation criteria were satisfied while the Florida Test results were that 97% of
7 the evaluation criteria were where KCI has reached conclusion. BellSouth has
8 now undergone two OSS Tests at a cost of well over \$100,000,000 (tests that
9 have taken four years to complete) and both OSS Tests have led to the same
10 conclusion—BellSouth provides non-discriminatory access to CLECs.

11

12 Finally, BellSouth engaged PricewaterhouseCoopers (“PwC”) to examine
13 BellSouth's assertions regarding the regionality of its pre-ordering and ordering
14 OSS. PwC's examination was conducted in accordance with “attestation
15 standards” established by the American Institute of Certified Public Accountants
16 (“AICPA”). An “attest engagement” occurs when a practitioner, such as PwC, is
17 engaged to issue a written communication that concludes whether or not the
18 written assertion of another party, such as BellSouth, is reliable. Under the
19 AICPA attestation standards, an examination is the highest level of assurance
20 that can be provided on an assertion and, if positive, results in an opinion by the
21 practitioner, PwC, that the assertions presented are fairly stated in all material
22 respects.

23 The purpose of the PwC attestation examination was to provide proof that
24 BellSouth's preordering and ordering OSS are regional and to assure
25 states within BellSouth's region that they could rely on OSS testing and

1 performance results from Georgia. PwC's modeled their attestation after
2 the Southwestern Bell's Five-State Regional OSS Attestation Examination.
3 Given that the FCC viewed this model positively, BellSouth has used it as
4 a roadmap. This proof contributed to the decisions of the Alabama,
5 Kentucky, Louisiana, Mississippi, North Carolina and South Carolina
6 Commissions to endorsement BellSouth's 271 applications along with the
7 FCC decision on Georgia and Louisiana.

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9 PwC's results from their assessment are extensively discussed in paragraphs 62
10 to 78 of Mr. Stacy's affidavit. PwC concluded that its examination provided a
11 reasonable basis for its opinion, in which it determined that the BellSouth
12 management assertions were fairly stated, in all material respects, as of May 3,
13 2001. The PwC Report provides data and validated factual assertions that this
14 Authority can rely upon to establish the Regionality of BellSouth's Pre-Ordering
15 and Ordering OSS.

16

17 From the CLECs' perspective, requesting additional testing is nothing but a
18 delaying tactic. One point that every participant in this proceeding would
19 probably agree with is that the telecommunications industry is always changing
20 and evolving— new technology, new products, and new competitors. BellSouth's
21 (and other RBOCs') interfaces and systems are constantly evolving as well.
22 Internal, regulatory, and even CLEC-driven changes are incorporated into the
23 systems to increase system functionality and performance. To argue that the
24 Authority should order additional testing because things have changed since the
25 Georgia and Florida tests began is the same thing as arguing that the Authority

1 should never move forward. There is no reason for the Authority to delay its
2 decision to bring the benefits of BellSouth's long distance service to the citizens
3 of Tennessee, just because Tennessee hasn't conducted its own third party
4 tests.

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6 Q. THIS AUTHORITY HAS PREVIOUSLY RULED ON BELL SOUTH'S
7 REGIONALITY, AND THE AUTHORITY DID NOT AGREE THAT BELL SOUTH'S
8 OSS WERE REGIONAL IN ALL INSTANCES. WHY SHOULD THE
9 AUTHORITY CONSIDER THE PREVIOUS ARGUMENT THAT OSS TESTING
10 IS NOT NECESSARY IN TENNESSEE?

11

12 A. BellSouth filed a Motion for Reconsideration and asked the Authority to
13 reconsider the *Order Resolving Phase I Issues of Regionality*, dated June 21,
14 2002. The Authority's order concluding that BellSouth's OSS was not regional
15 was not consistent with the FCC or any of the other state commissions who have
16 ruled on the regionality of BellSouth's Pre-ordering and Ordering OSS. For
17 instance, on May 15, 2002, the FCC issued an order approving BellSouth's
18 applications for interLATA relief in Georgia and Louisiana. As part of that
19 decision, the FCC concluded that BellSouth's OSS in Georgia and Louisiana are
20 the same. Specifically, the FCC stated that

1 “We conclude that BellSouth, through the PwC review and other
2 aspects of its application, provides sufficient evidence that its
3 electronic processes are the same in Georgia and Louisiana...in
4 addition to PwC’s review, the record indicates that BellSouth OSS
5 for pre-ordering and ordering functions does not distinguish
6 between Georgia and Louisiana.” (*Georgia/Louisiana Order*, ¶ 110)

7
8 In reaching this decision, the FCC “reject[ed] competitive LEC claims that
9 BellSouth’s OSS are not the same in Georgia and Louisiana.” *Id.* at ¶

10 111. Finally, the FCC stated that:

11 “Accordingly, we find that BellSouth, through the PwC audit and its
12 attestation examination, provides evidence that its OSS in Georgia
13 are substantially the same as the OSS in Louisiana. We shall
14 consider BellSouth’s commercial OSS performance in Georgia and
15 the Georgia third-party test to support the Louisiana application and
16 rely on Louisiana performance to support the Georgia application.
17 In addition, because the OSS are the same in both states, where
18 low volumes in one state yield inconclusive or inconsistent
19 information concerning BellSouth’s compliance with the competitive
20 checklist, we can examine data reflecting BellSouth’s performance
21 in the other state.”
22

23 ***Id.***

24
25 Clearly, the FCC has set forth an explicit roadmap for Section 271 applicants to
26 follow to prove that their OSS are regional. The FCC defined “the kind of
27 evidentiary showing that will be expected of applicants in the future” who seek to
28 make a regionality showing. The FCC further stated that “[b]y explaining clearly
29 what types of evidence we have found to be persuasive in this instance, we are
30 establishing a roadmap that can be followed by other applicants.”¹
31

¹ *SWBT Kansas/Oklahoma Order*, at ¶110.

1 To demonstrate regionality, an RBOC must show that it provides wholesale
2 services to competing carriers in its various states through one OSS "using
3 common interfaces, systems, procedures and, to a large extent, common
4 personnel." *Kansas/Oklahoma Order*, at 107. An RBOC may demonstrate either
5 that competing carriers in its various states share the use of a single OSS
6 (meaning "a common set of processes, business rules, interfaces, systems and,
7 in many instances, even personnel"); or that the OSS "reasonably can be
8 expected to behave the same way in all three states." *Id.* at 111. An RBOC
9 must make this showing for both the manual, as well as the mechanized aspects
10 of its OSS. *Id.* On the mechanized side, an RBOC must show that the key
11 interfaces used by CLECs to submit LSRs to the RBOC are the same region-
12 wide (in other words that a CLEC can use one interface to submit orders for any
13 state in the region without state-specific modifications). *Id.* at 114.

14
15 For the manual aspects of its OSS, an RBOC must show that "the personnel
16 involved in actual provisioning and maintenance/repair of CLEC orders in Kansas
17 and Oklahoma will do their jobs in the same manner as those in Texas." *Id.* at
18 113. The FCC relied on evidence that certain functions were performed out of
19 region-wide work centers; that state-specific operations use the same systems
20 and same procedures region-wide; personnel receive the same training region-
21 wide; and that there is a common organizational structure region-wide. The FCC
22 concluded that, based on this evidence, "it is reasonable to conclude that the
23 existence of these similarities will result in similar performance." *Id.* at 113.

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In addition, the FCC, in its decision on BellSouth’s Section 271 applications for Georgia and Louisiana, the FCC found the same PwC attestation credible and reliable. Specifically, the FCC stated:

“We conclude that BellSouth, through the PwC review and other aspects of its application, provides sufficient evidence that its electronic processes are the same in Georgia and Louisiana. In conducting its review, PwC examined the consistency of applications and technical configurations used to process pre-ordering and ordering transactions region-wide, and reviewed the consistency of documentation of systems and processes in BellSouth’s local carrier service center. PwC observed transactions, reviewed user guides, performed change control review, and interviewed relevant BellSouth service representatives in making its determination that BellSouth’s OSS systems for pre-ordering and ordering are identical. PwC also reviewed the consistency of Local Service Requests (LSRs) for order entry, LSR screening and validating procedures, and various servicing processes to conclude that there is “no material difference in functionality or performance” between DOE and SONGS.”
(Georgia/Louisiana Order, para. 110

The FCC relied on the attestation, in conjunction with the other evidence in the record, to conclude that BellSouth’s OSS in Georgia and Louisiana are the same.

BellSouth followed the roadmap established by the FCC, and has provided conclusive evidence that its Pre-ordering and Ordering OSS are regional. The Authority’s conclusion to the contrary is at odds with the guidance provided by the FCC in this area, and with the facts.

Q. CAN YOU PROVIDE AN OVERVIEW OF THE FLORIDA OSS TEST AND THE RESULTS FOR THE TEST?

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2 A. Yes. The overall test of BellSouth's OSS was designed to be multi-faceted and
3 provide end-to-end coverage of the systems, interfaces and processes that
4 enable CLECs to compete with BellSouth for customers' local telephone service.
5 In determining the breadth and depth of the test, all stages of the CLEC-ILEC
6 relationship were considered. These included the following:

- 7 • Establishing the relationship
- 8 • Performing daily operations
- 9 • Maintaining the relationship

10 Further, each of the service delivery methods — resale, unbundled network
11 elements ("UNE") and combinations of UNEs, including the UNE Platform ("UNE-
12 P") were included in the scope of the test.

13 The plan was divided into three test families to organize and facilitate testing:

14

- 15 • Performance Metrics Review (PMR)
- 16 • Policies and Procedures Review (PPR)
- 17 • Transaction Validation and Verification (TVV)

18

19 The areas subject to testing that mirror the major business functions performed
20 by a telecommunications carrier (ILEC or CLEC) were:

- 21 • Relationship Management and Infrastructure (RMI) which included
22 Account Team, CLEC Training and Change Management
- 23 • Order Management (OM) for Preordering and Ordering of services
- 24 • Provisioning of services
- 25 • Maintenance and Repair Services (RPM for Repair, Provisioning and
26 Maintenance)
- 27 • Billing (BLG) of services provides
- 28 • Metrics testing of the Service Quality Measurements ("SQM") ordered
29 by the FPSC

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Within each of the test families, the methods and processes to be applied to measure BellSouth’s performance were described along with the specific points in the systems and processes where BellSouth performance was evaluated. The results of the test were compared against measures and criteria established by the FPSC in the SQM, or established by KCI if measures did not exist.

The plan also described the development and application of scenarios to be used within the TVV test families in evaluating BellSouth’s OSS and related support services. KCI developed these scenarios to test the functionality of BellSouth’s pre-ordering and ordering, provisioning maintenance and repair and billing systems. The scenarios were designed to depict real-world situations that CLECs currently face or may face in the near future. The scenarios were used to develop test cases that provided a detailed description of the transactions and introduced additional variables, such as errors and supplements to further simulate real world transactions. In addition, KCI submitted live transactions through coordination with CLECs. The test was conducted using the latest BellSouth interfaces in production. The interfaces included the Trouble Administration Facilitation Interface (“TAFI”), Electronic Communication Trouble Administration (“ECTA”), Optional Daily Usage File (“ODUF”), Access Daily Usage File (“ADUF”), Customer Record Information System (“CRIS”), Carrier Access Billing System (“CABS”), Local Exchange Navigation System (“LENS”) a Graphical User Interface (GUI), Telecommunications Access Gateway (“TAG”), a machine-to-machine interface and Electronic Data Interchange (“EDI”) a batch-driven machine-to-machine interface. Manual order processing was also a

1 component of the Florida test. Additionally, the test was conducted using the
2 most current release of the BellSouth business rules at the time of the test.

3 The test adopted the military-style test philosophy, which suggested a “test until
4 you pass” approach. The issuance of Exceptions and Observations process
5 associated with a military style process is described in detail in the Report in
6 Exhibit MM-7.

7 KCI began its testing efforts in early 2000 under the guidance of the FPSC Staff.

8 The testing has covered over a thousand test points or evaluation criteria over
9 this testing period. KCI published the Report on June 21, 2002. (Exhibit MM-7)

10 This document includes all the test points, test history and test results. The
11 Report should be viewed in two phases. The first phase includes OM, RMI,
12 RPM, and BLG. The second phase is for the metrics test. BellSouth upgraded
13 its metrics-reporting platform with the April metrics reports so KCI is now
14 retesting all the metrics test points, thus these test points are rated as “Testing in
15 Progress” in the Report. In the Report, KCI defines its evaluation criteria as “the
16 norms, benchmarks, standards, and guidelines used to evaluate items identified
17 for testing. Evaluation criteria also provided a framework for identification of the
18 scope of tests, and the types of measures that must be made during testing, and
19 the approach necessary to analyze results.

20 The results of the first phase concluded that 94% of the evaluation criteria were
21 satisfied while 3% remain testing in progress and 3% were shown as not
22 satisfied. BellSouth expects all testing in progress evaluation criteria for phase
23 one to be completed and satisfied when the Report is updated and issued as

Version 2 on July 30, 2002. When considering just the evaluation where KCI has reached conclusion, i.e.: satisfied or not satisfied evaluation criteria, BellSouth's success rate is at 97%. This overwhelming success rate combined with BellSouth's commercial data provides conclusive evidence that BellSouth provides non-discriminatory access and parity to CLECs.

The specific results for each test domain, as published in the Report on June 21, 2002 are as follows:

Domain	Satisfied	Not Satisfied	Testing in Progress	Total
Order Management	105	4	1	110
Billing	81	0	6	87
Relationship Mgmt Infrastructure	67	7	0	74
Repair Provisioning & Maintenance	202	4	7	213
Phase I Total	455 ²	15	14	484
%	94%	3%	3%	100%

KCI thoroughly assessed each test point and provides a detailed test history for each of the evaluation criteria in the Report. The Executive Summary of the Report provides an overview of each test domain and its respective results.

The Report did identify a few areas where BellSouth did not meet the standards established by either the Florida Public Service Commission (FPSC) or KCI.

These "not satisfied" findings, as will be demonstrated below, have no impact on a CLEC's ability to compete. Moreover, under the guidance of the FPSC and the

² These totals differ by one from KCI's Executive Summary due to discrepancies between KCI's Report and the Executive Summary. The above table is based on the individual test results.

1 FCC, BellSouth will continue to make changes and improve both processes and
2 results to address these few issues identified in the Report. It is important to
3 review the Report in its totality and to see the vast number of satisfied test points
4 on key test processes and products. The results of the test are very positive with
5 a 97% success rate, which does provide further proof that BellSouth provides
6 non-discriminatory access to its OSS.

7
8 The following summary of the few “not satisfied” OSS evaluation criteria further
9 confirms BellSouth’s successful performance on the Test in that none of the “not
10 satisfied” criteria constitutes an impediment to a CLEC’s ability to compete in
11 Florida, Tennessee, or any other state in BellSouth’s region. A brief description of
12 each exception and its “not satisfied” evaluation criteria along with BellSouth’s
13 assessment of each issue follows:

14
15 **RMI Domain**

16 Exception 88 – KCI alleges that the BellSouth Change Control Prioritization
17 process does not allow CLECs to be involved in prioritization of all CLEC
18 impacting change requests. This finding resulted in three not satisfied evaluation
19 criteria, PPR1-3, PPR1-4 and PPR1-8.

20 BellSouth Response - BellSouth has proposed numerous changes to the Change
21 Control Process to address the issues identified by KCI. The CLECs have
22 adopted several of the changes, but there are a few, particularly related to the
23 prioritization of change requests, that have not reached consensus. KCI stated
24 in the Report that BellSouth’s last proposal, if implemented, would address KCI’s
25 concerns raised in Exception 88 and addressed in the currently not satisfied
26 evaluation criteria in the PPR1 test in the report. The issue is described in detail
27 under the RMI Domain section of the Report.

28
29 The FPSC Staff has also commented favorably on BellSouth’s latest proposal
30 and the internal process that would support it. In its recommendation dated July
31 15, 2002, the Staff concludes, “Staff recommends that at present, the “50/50”
32 proposal, as reflected in the attached document entitled End-to-End Process
33 Flow, Draft Version 2.1, be implemented by BellSouth to resolve the Change

Control Process impasse.” The FPSC will consider this recommendation during its July 23, 2002 agenda session. Once this process is implemented, Exception 88 and the three not satisfied evaluation criteria would be satisfied.

Exception 123 - BellSouth is not classifying Change Requests as defects in accordance with the BellSouth definition of a Defect. This finding resulted in one not satisfied evaluation criteria, PPR1-6.

BellSouth’s Response - BellSouth has revised internal documentation, introduced a job aid and conducted employee training sessions to ensure that both BellSouth and CLEC-initiated defects are classified in accordance with the new definition of CLEC-affecting, and that they are communicated through the Change Control Process. BellSouth believes the additional training, and the creation of a job aid documentation modifications address any concerns associated with this issue.

Exception 157 – KCI alleges that BellSouth fails to follow its software testing and quality guidelines – This finding resulted in three not satisfied evaluation criteria, PPR5-2, PPR5-3 and PPR5-17.

BellSouth’s Response: - KCI has asserted that BellSouth’s methodology for developing software and interfaces are not consistently followed. KCI has observed Releases 10.2, 10.3, and 10.5.

Ms. Lichtenberg also refers to this exception as an issue on page 6 of her testimony. As for KCI’s criticisms regarding Releases 10.2 and 10.3, BellSouth investigated KCI’s findings, which focused on some BellSouth internal testing documents, and disagreed with KCI’s conclusions in Exception 157. BellSouth follows the industry standard model for testing software. Both Release 10.2 and 10.3 met BellSouth’s testing and quality standards. Release 10.5, which was originally scheduled for implementation May 17-18, 2002, did not. During the week before the release, BellSouth identified six severity level 2 defects for which BellSouth could not implement adequate workarounds before the planned Production Release date of May 17, 2002.³ Because of this, and to ensure that the release met the quality standards to which BellSouth committed, and that the CLECs had additional time to test the release, BellSouth delayed the implementation of Release 10.5. The CLECs were notified via the carrier notification process. On June 1-2, 2002, BellSouth implemented Release 10.5 with two severity level 3 defects, which have been described to the CLECs in change requests CR0800 and CR0801.⁴ Immediately after the implementation of Release 10.5, BellSouth began routine post-implementation monitoring and testing to insure that the installed software was functioning properly in production. Over the next several days, BellSouth identified specific situations in

³ Severity level 2 means that system functionality is degraded with serious adverse impact to the user and there is not an effective work-around.

⁴ Severity level 3 means that system functionality is degraded with a moderate adverse impact to the user but there is an effective workaround.

1 which the software was not functioning exactly as expected. The CLECs were
2 notified via defect notifications and the associated change requests, and also via
3 the daily change request report that is emailed to the CCP participants.⁵ KCI has
4 amended Exception 157 to include criticisms related to Release 10. 5. As in
5 BellSouth's original response to Florida Exception 157, BellSouth has
6 investigated KCI's findings and disagrees with KCI's assessment. BellSouth has
7 followed its software testing and quality processes for each release.

8
9 To further address this issue, on July 9, 2002 the FPSC mandated three new
10 manual Change Management Service Quality Measurements (SQMs). The new
11 measures focus on the number of defects associated with releases, the duration
12 associated with defect correction and software validation.

13 **Order Management Domain**

14 Exception 121 – KCI could not identify flow through Firm Order Confirmations
15 (FOC) on Local Number Portability (LNP) LSRs submitted electronically via the
16 mechanized ordering process. This finding resulted in one not satisfied
17 evaluation criteria, TVV3-4.

18 BellSouth Response - According to Ordering 0-3 of the Service Quality
19 Measurement Plan, BellSouth should issue a flow through FOC on 85% of LNP
20 LSRs submitted through mechanized ordering processes. During the initial test,
21 BellSouth's flow through rate for the test was 86%, which exceeds the 85%
22 benchmark. KCI issued an amended exception on 6/6/02 based on a retest from
23 2/15/02 to 5/23/02. They found a flow through rate of 76.5% based on 34
24 transactions. The 8 LSRs listed in the amendment as failures were all submitted
25 on a single billing account. The Customer Service Record ("CSR") for the billing
26 account contained two virgules (/) in the listed field, instead of one virgule (/).
27 Invalid data on the CSR caused the 8 LSRs listed above to fall out for manual
28 intervention. The CSR data that caused this issue was corrected on 05/08/02.
29 Additionally, the LSRs listed in this exception were submitted within 3 days
30 (03/21/02, 03/22/02 and 04/25/02) on a single account. Ordering O-3 measures
31 the percentage of LNP LSRs that flow through for an entire month. BellSouth's
32 commercial data available through SQM reports provides a complete view of
33 Ordering O-3 results for LNP. BellSouth's results for January 2002 through April
34 2002 are 92.81%, 94.12%, 92.25% and 92.59% compared to a benchmark of
35 85%. KCI's small sample size and a single billing account are not representative
36 of BellSouth's actual LNP flow through rates.

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39 Exception 122 – KCI alleges that BellSouth did not provide flow-through
40 classification information for Digital Subscriber Line (DSL) orders submitted by
41 KCI. This finding resulted in one not satisfied evaluation criteria, TVV3-2.

42 BellSouth Response - As part of the "Flow-Through" Evaluation, KCI found that
43 xDSL PONs were not being reported on the LSR Detail Report. BellSouth will

⁵ The defect notifications are posted at
http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp_t6dn.html.

1 implement a feature in Release 10.6 on 8/25/02 so xDSL flow-through data will
2 be added to the LSR detail report. This is simply a product reporting issue that
3 has no impact to a CLEC's ability to submit xDSL PONs to BellSouth. This
4 exception should be closed since this is a Metrics report issue and is captured in
5 metrics Exception 113.
6

7 Exception 136 – KCI alleges that they did not receive flow through firm order
8 confirmations (FOC) on unbundled network element (UNE) LSR submitted
9 electronically via the mechanized ordering process. This finding is related to the
10 same evaluation criteria as Exception 122,TVV3-2.
11 BellSouth's Response - KCI did rate as "satisfied" both Residential and Business
12 Resale flow through. BellSouth's overall flow through results show that
13 BellSouth's flow through performance remains strong. This is most clearly
14 demonstrated by flow through data for CLECs that submit large numbers of
15 requests and yet maintain high flow through rates. In fact, three of the top five
16 CLECs measured by electronic LSR volume in the region for the first quarter
17 2002 have flow through rates ranging from 90.19% to 94.64%. BellSouth's
18 commercial Flow Through data show BellSouth exceeds the benchmark for LNP
19 Flow Through and is close to meeting the UNE benchmark.
20

21 BellSouth remains committed to improving flow through rates for products
22 ordered by CLECs. On July 9, 2002 the FPSC mandated that BellSouth file a
23 specific action plan by July 30, 2002, designed to further improve the flow-
24 through SQM to achieve the mandated benchmarks for the flow through metric.

25
26 Exception 161 – KCI alleges that they have not received timely Non-Mechanized
27 rejects from BellSouth. This finding resulted in one not satisfied evaluation
28 criteria, TVV1-3-16.

29 BellSouth Response – KCI did not follow the military style test philosophy in this
30 instance since they retested a test that was satisfied. BellSouth passed the
31 original test for this evaluation criterion and passed each of the four manual
32 volume tests. BellSouth disagreed with KCI's exception in that KCI included in its
33 production retest of the non-mechanized interface complex products and
34 services that are submitted to the Complex Resale Services Group ("CRSG").
35 The 0-8 ordering measure which KCI applied exclusively to the timeliness of
36 orders handled by the Local Carrier Service Center ("LCSC"). Thus, the time
37 intervals for complex orders handled by the CRSG should not have been
38 included in the KCI test results. When the CRSG transaction intervals are
39 excluded, BellSouth returned 100% of the non-mechanized rejects within the
40 benchmark. BellSouth disagrees with KCI's findings on this issue. There is
41 ample test data and commercial data reported in the monthly SQMs to
42 demonstrate that BellSouth provides manual rejects in a timely manner and to
43 reject KCI's allegation in this exception.
44

45 Exception 165 – KCI alleges that BellSouth provides inconsistent and incorrect
46 information on Clarification (CLR) responses for Resale, UNE-P, and UNE Loop

1 service requests. This finding resulted in one not satisfied evaluation criteria,
2 TVV1-2-2.

3 BellSouth Response – BellSouth disagrees with KCI’s conclusion in this
4 exception. First, BellSouth passed (meeting the 95% KCI benchmark) this
5 evaluation criteria in both the original test (96.01%) and the first retest (96.49%).
6 Thus, there was no need for the second retest addressed in this exception.
7 Second, although KCI initially reported performance of 83%, KCI later agreed
8 with BellSouth that the performance was actually 89%. Third, 1/3 of the
9 inaccurate responses in this exception were the result of a single test scenario
10 that is rare in the commercial market. Specifically, KCI tested a scenario in which
11 the end-user requested a disconnect on the main telephone number of a multi-
12 line business account. While business customers do disconnect second lines that
13 are no longer needed, business customers typically want to retain their main
14 telephone number that is published and used by their customers. Finally,
15 BellSouth will resolve the majority of the inaccurate responses by updating the
16 usage rules for specific fields in the BBR-LO through the change control process.
17 Additionally, one system change (CR 0705) was implemented in Release 10.5 on
18 June 1, 2002.

20 **Provisioning Domain**

21 Exception 84 – KCI alleges that BellSouth failed to use the proper codes when
22 provisioning switch translations. This finding resulted in two not satisfied
23 evaluation criteria, TVV4-3 and TVV4-28.

24 BellSouth’s Response - The test scenario failure associated with this exception
25 as described above is rarely encountered in the business environment and thus
26 has no meaningful impact on a CLEC’s ability to compete in the local market.
27 Specifically, KCI again tested a scenario in which the end user requested to
28 disconnect the main telephone number of an existing multi-line business account
29 and to reassign a secondary line as the main line. While such a scenario is
30 possible, a business customer would not typically disconnect its main telephone
31 number that is published to, and used by, its customers. When this non-realistic
32 scenario is excluded from the data in exception 84, BellSouth’s success rate
33 increases from 90% to 97%, which exceeds the KCI, applied standard of 95%
34 and would satisfy the two evaluation criteria. Even though this scenario is rare,
35 BellSouth has opened a change request to update the business rules for
36 disconnecting the main telephone number of an existing multi-line account, as
37 well as updated methods and procedures for its service representatives. Thus,
38 this rare commercial ordering issue will be resolved, but it has no real impact on
39 the CLEC community.

40
41 Exception 171 – KCI alleges that BellSouth’s systems or representatives have
42 not consistently updated the directory databases as specified in orders submitted
43 by KCI. This finding resulted in two not satisfied evaluation criteria TVV4-1 and
44 TVV4-29.

45 BellSouth’s Response - KCI’s conclusion that BellSouth failed to consistently
46 update the directory databases was based in significant part (13% of the

1 transactions) on the same unlikely test scenario described above. When this
2 commercially insignificant test scenario is excluded, BellSouth's performance
3 was 98.5%, well above KCI's 95% benchmark. To address the remaining 1.5%,
4 BellSouth will open a change request to include the community name, when
5 appropriate, for New Directory Listing orders. This change request will address
6 the orders, although this small number of errors is not commercially significant.

7
8 As this brief discussion makes clear, these "not satisfied" evaluation criteria have
9 no meaningful impact on a CLEC's ability to compete. Moreover, they are
10 particularly insignificant in light of the 97% success rate on the extensive test.

11
12 Q: PLEASE PROVIDE A STATUS ON THE TESTING IN PROGRESS
13 EVALUATION CRITERIA SHOWN IN THE REPORT.

14
15 A. Certainly. BellSouth would also like to provide a current status of the fourteen
16 test evaluation criteria that were shown as Testing in Progress in the Report.

17 **Order Management Domain**

18 TVV1-1-4 evaluates if BellSouth manual order process provides expected system
19 functionality. KCI is testing BellSouth's ability to process new orders for
20 Centrex® service as described in Exception 162. CLECs have not ordered any
21 new Centrex® service, but KCI is testing the product since it was included in the
22 MTP.

23 **Provisioning Domain**

24 At the time of the Report, KCI was waiting on April retail data for the SQM metric
25 P-3: Percent Missed Installation Appointments for evaluation criteria TVV4-5 and
26 TVV4-6 and on SQM Metric P-2: Percentage of Orders Put in Jeopardy for
27 evaluation criteria TVV4-7 and TVV4-8. This data was subsequently submitted
28 to KCI, and KCI announced in the Workshop on July 12, 2002 that these four
29 evaluation criteria were now satisfied.

30
31 Additionally, at the time of the report, KCI was waiting on April and May data for
32 the SQM P-9 Percentage Troubles within 30 Days of Service Order Completion
33 for evaluation criteria TVV 4-9 and TVV 4-10. The April data was provided prior
34 to the workshop, and the May data was provided on July 18, 2002. This data
35 satisfied KCI's requests, thus these two evaluation are now considered satisfied.

TVV4-39 evaluated the accuracy of BellSouth's Line Loss Reports. KCI announced on the July 15, 2002 CLEC Exception Status Call that they had completed their retest on the accuracy of Line Loss Reports, and concluded that BellSouth met the standard. KCI closed the exception, thus this evaluation criteria became satisfied.

Billing Domain

As a part of the retest on UNE invoices, KCI had not reached conclusion when the Report was issued for six evaluation criteria. Currently, two evaluation criteria remain Testing in Progress while four have since been satisfied. BellSouth expects the remaining two evaluation criteria to be satisfied when Version 2 of the Report is issued on July 30, 2002. A description of each evaluation criteria follows:

TVV11-2-2 evaluates if recurring rates on UNE invoices are consistent with applicable tariffs and/or contract rates. In previous testing, 100% of the monthly recurring charges reviewed were consistent with applicable tariffs and/or contract rates. UNE testing related to the Tapestry upgrade is still in progress and will be completed pending receipt of two commercial bills.

TVV11-2-14 evaluates if pro-rated calculations on UNE invoices are consistent with applicable tariffs and/or contract rates. In current testing related to the IBS/Tapestry UNE upgrade, 100% of the 105 pro-rated charges reviewed to date were consistent with applicable tariffs and/or contract rates. This testing is still in progress and will be completed pending receipt of two commercial bills.

Evaluation criteria TVV11-2-5, TVV11-2-16, TVV11-2-17 and TVV11-3-3 have all been resolved through exception closures (Exceptions 44, 164 and 172), and are now considered satisfied.

As of July 22, 2002, the specific results for each test domain are as follows:

Domain	Satisfied	Not Satisfied	Testing in Progress	Total
Order Management	105	4	1	110
Billing	85	0	2	87
Relationship Mgmt Infrastructure	67	7	0	74
Repair Provisioning & Maintenance	209	4	0	213
Phase I Total	466	15	3	484

				4
%	96 %	3%	1%	10 0%

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Q. PLEASE DISCUSS THE ISSUE ASSOCIATED WITH THE THREE FLORIDA EXCEPTIONS RAISED BY MR. BRADBURY ON PAGES 15 AND 16 OF HIS TESTIMONY.

10

11

12

A. Mr. Bradbury states that timely, complete and accurate status notices are critical to CLECs. He says that BellSouth does not provide complete information in its status notifications and uses the three Florida exceptions as the basis of his argument. I would like to address each of the Florida exceptions, and then put this issue in perspective as reported by KCI in the Florida Test.

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Exception 165

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KCI alleges that BellSouth provides inconsistent and incorrect information on Clarification (CLR) responses for Resale, UNE-P, and UNE Loop service requests. This finding resulted in one not satisfied evaluation criteria, TVV1-2-2. BellSouth Response – BellSouth disagrees with KCI's conclusion in this exception. First, BellSouth passed (meeting the 95% KCI benchmark) this evaluation criteria in both the original test (96.01%) and the first retest (96.49%). Thus, there was no need for the second retest addressed in this exception. Second, although KCI initially reported performance of 83%, KCI later agreed with BellSouth that the performance was actually 89%. Third, 1/3 of the inaccurate responses in this exception were the result of a single test scenario

1 that is rare in the commercial market. Specifically, KCI tested a scenario in which
2 the end-user requested a disconnect on the main telephone number of a multi-
3 line business account. While business customers do disconnect second lines that
4 are no longer needed, business customers typically want to retain their main
5 telephone number that is published and used by their customers. Finally,
6 BellSouth will resolve the majority of the inaccurate responses by updating the
7 usage rules for specific fields in the BBR-LO through the change control process.
8 Additionally, one system change (CR 0705) was implemented in Release 10.5 on
9 June 1, 2002.

11 Exception 166

12 KCI issued this exception to address an issue with the Billing Account Number
13 (BAN) not being returned to CLECs on their Firm Order Confirmations (FOCs).
14 In response to a CLEC's complete and correct Local Service Request (LSR),
15 BellSouth generates a FOC that details the service completion due date, CLEC
16 Company Code, Purchase Order Number and version, and the BAN. KCI
17 alleged that BellSouth's failure to provide BANs may require CLECs to utilize
18 additional resources to verify BAN information in order to successfully process
19 individual customer orders. BellSouth agreed that the BAN was not being
20 returned as it should, and corrected the issue in Release 10.5 on June 1, 2002.
21 KCI subsequently retested the issue and found that BANs were being
22 successfully returned in FOCs so the exception was satisfied and closed.
23 However, BellSouth disagrees with KCI's assessment of the issue as it impacts
24 CLECs since CLECs actually submit the BAN to BellSouth when they submit the
25 LSR, thus they have the BAN information, and no CLEC had detected that the
26 BAN was not being returned. If it were pertinent to their operations, CLECs
27 would have found the issue and identified it to BellSouth before KCI raised it as
28 an issue.

30 Exception 170

31 KCI issued this exception to identify that they had not received complete Missed
32 Appointment (MA) responses to service requests. CLECs expect to receive a
33 MA response when an appointment is missed due to an end-user reason. KCI
34 expected that at least 95% of all MA responses from BellSouth to be accurate
35 and complete. KCI alleged that only 75% (21/28) of the MA responses were
36 determined to be complete. BellSouth researched the KCI's findings and
37 provided conclusive evidence that KCI had indeed actually received complete
38 MA responses. BellSouth provided KCI with actual screenshots of the MA
39 responses. BellSouth's provided accurate and complete MA responses for 100%
40 of the transactions. KCI agreed that BellSouth had met the 95% standard, so the
41 exception was satisfied and closed.

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KCI extensively tested notification responses in both the Georgia and Florida Tests. The table that follows provides a full report of the timeliness, completeness and accuracy of notifications as measured by KCI in the Florida Test. The two evaluation criteria (FL Test References TVV1-2-2 and TVV1-3-16) are the result of previously discussed Florida exceptions 161 and 165.

FL Evaluation Criteria Description	FL Test Reference	FL Test Result
BellSouth systems or representatives provide accurate and complete Firm Order Confirmations (FOCs)	TVV1-2-1	Satisfied
BellSouth system or representatives provide accurate and complete Error (ERR)/Clarification (CLR) messages.	TVV1-2-2	Not Satisfied
BellSouth systems or representatives provide accurate and complete Completion Notices (CNs).	TVV1-2-3	Satisfied
BellSouth systems or representatives provide, accurate and complete Missed Appointment (MA) Notifications.	TVV1-2-4	Satisfied
BellSouth Service Order Tracking System (CSOTS) provides accurate LSR status.	TVV1-2-5	Satisfied
BellSouth's EDI interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	TVV1-3-1	Satisfied
BellSouth's EDI interface provides Fully Mechanized (FM) reject (REJ) responses within the agreed upon standard interval.	TVV1-3-2	Satisfied
BellSouth's EDI interface provides Partially Mechanized (PM) rejects (REJ) responses within the agreed upon standard interval.	TVV1-3-3	Satisfied
BellSouth's EDI interface provides Fully Mechanized (FM) Firm Order Confirmations (FOC) responses within the agreed upon standard interval.	TVV1-3-4	Satisfied
BellSouth's EDI interface provides Partially Mechanized (PM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV1-3-5	Satisfied
BellSouth's EDI interface provides timely Completion Notifications (CNs).	TVV1-3-6	Satisfied
BellSouth's TAG interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	TVV1-3-7	Satisfied
BellSouth's TAG interface provides Fully Mechanized (FM) reject/error (REJ/ERR) responses within the agreed upon standard interval.	TVV1-3-8	Satisfied
BellSouth's TAG interface provides Partially Mechanized (PM) rejects (REJ) responses within the agreed upon standard interval.	TVV1-3-9	Satisfied
BellSouth's TAG interface provides Fully Mechanized (FM) Firm Order Confirmation (FOCs) responses within the agreed upon standard interval.	TVV1-3-10	Satisfied
BellSouth's TAG interface provides Partially Mechanized (PM)	TVV1-3-11	Satisfied

Firm Order Confirmation (FOC) responses within the agreed upon standard interval.		
BellSouth's TAG interface provides Completion Notifications (CNs) within the agreed upon standard interval.	TVV1-3-12	Satisfied
BellSouth's LENS interface provides Fully Mechanized (FM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV1-3-13	Satisfied
BellSouth's LENS interface provides Partially Mechanized (PM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV1-3-14	Satisfied
BellSouth's manual order process provides Acknowledgements (ACKs) within the agreed upon standard interval.	TVV1-3-15	Satisfied
BellSouth's manual order process provides reject (REJ) responses within the agreed upon standard interval.	TVV1-3-16	Not Satisfied
BellSouth's manual order process provides Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV1-3-17	Satisfied
BellSouth's manual order process provides Completion Notifications (CNs) within the agreed upon standard interval.	TVV1-3-18	Satisfied
BellSouth's EDI interface provides Functional Acknowledgements (FA).	TVV2-4-1	Satisfied
BellSouth's TAG interface provides Functional Acknowledgements (FAs) or synchronous fatal rejects (ERRs) as expected.	TVV2-4-2	Satisfied
BellSouth's EDI interface provides Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	TVV2-4-3	Satisfied
BellSouth's TAG interface provides Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	TVV2-4-4	Satisfied
BellSouth's LENS interface provides Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	TVV2-4-5	Satisfied
BellSouth's Manual Order process provides Firm Order Confirmations, Errors, and Clarifications.	TVV2-4-6	Satisfied
BellSouth's EDI interface provides accurate Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	TVV2-5-1	Satisfied
BellSouth's TAG interface provides accurate Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	TVV2-5-2	Satisfied
BellSouth's LENS interface provides accurate Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	TVV2-5-3	Satisfied
BellSouth's manual ordering process provides accurate Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	TVV2-5-4	Satisfied
BellSouth's EDI interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	TVV2-6-1	Satisfied
BellSouth's EDI interface provides Fully Mechanized (FM) error/clarification (ERR/CLR) responses within the agreed upon standard interval.	TVV2-6-2	Satisfied
BellSouth's EDI interface provides Fully Mechanized (FM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV2-6-3	Satisfied
BellSouth's TAG interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	TVV2-6-4	Satisfied
BellSouth's TAG interface provides Fully Mechanized (FM)	TVV2-6-5	Satisfied

error/clarification (ERR/CLR) responses within the agreed upon standard interval.		
BellSouth's TAG interface provides Fully Mechanized (FM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV2-6-6	Satisfied
BellSouth's LENS interface provides Fully Mechanized (FM) error/clarification (ERR/CLR) responses within the agreed upon standard interval.	TVV2-6-7	Satisfied
BellSouth's LENS interface provides Fully Mechanized (FM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV2-6-8	Satisfied
BellSouth's manual ordering process provides error/clarification (ERR/CLR) responses within the agreed upon standard interval.	TVV2-6-9	Satisfied
BellSouth's manual ordering process provides Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	TVV2-6-10	Satisfied

1 These results are conclusive and demonstrate that Mr. Bradbury's
2 conclusion is not based on facts. BellSouth does provide timely,
3 complete, and accurate notifications to CLECs.

4
5 Q. PLEASE SUMMARIZE YOUR COMMENTS.

6
7 A. The Georgia Test met its objective of providing – in conjunction with extensive
8 commercial usage in Georgia – a comprehensive, independent third-party test of
9 the readiness of BellSouth's Operational Support Systems, related interfaces,
10 documentation and processes to support local market entry by CLECs as
11 evidenced by the FCC's approval of BellSouth's section 271 applications in
12 Georgia and Louisiana. This test was adequate and its results were both
13 independently attained and based upon facts. Ninety-eight percent of the
14 evaluation criteria in the Georgia Test were satisfied versus not satisfied.
15 Additionally, the Florida OSS Test Draft Final Report has been published with
16 97% of the evaluation criteria satisfied. BellSouth's Pre-ordering and Ordering
17 Systems are regional as found by PwC and the FCC. BellSouth provides non-
18 discriminatory access to its OSS in compliance with the Authority's requirements

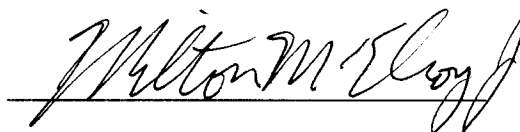
1 as demonstrated by its commercial usage and the independent third party OSS
2 Test in Georgia.
3
4 This concludes my testimony.

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Milton McElroy, Jr.- Director, Interconnection Services, BellSouth Telecommunications, Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 97-00309 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 28 pages and 7 exhibit(s).



Milton McElroy, Jr.

Sworn to and subscribed
before me on July 22, 2002


NOTARY PUBLIC

Notary Public, Gwinnett County, Georgia
My Commission Expires June 27, 2005